

Michael V. Infuso, Esq., Nevada Bar No. 7388  
Keith W. Barlow, Esq., Nevada Bar No. 12689  
**GREENE INFUSO, LLP**  
3030 South Jones Boulevard, Suite 101  
Las Vegas, Nevada 89146  
Telephone: (702) 570-6000  
Facsimile: (702) 463-8401  
E-mail: minfuso@greeneinfusolaw.com  
kbarlow@greeneinfusolaw.com

Attorneys for Defendant  
National Consumer Telecom & Utilities Exchange, Inc.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KELSEY O'HANLON,

Plaintiff,

v.

NATIONAL CONSUMER TELECOM &  
UTILITIES EXCHANGE, INC., and AT&T  
SERVICES, INC.

Defendants.

Case No. 2:22-cv-01347-JCM-EJY

**STIPULATION FOR EXTENSION  
OF TIME FOR NATIONAL  
CONSUMER TELECOM &  
UTILITIES EXCHANGE, INC. TO  
FILE RESPONSE TO COMPLAINT**

**(FIRST REQUEST)**

Defendant National Consumer Telecom & Utilities Exchange, Inc. ("Defendant" or "NCTUE"), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff Kelsey O'Hanlon ("Plaintiff" or "Douangdara"), by and through her counsel of record, the law firm of Kind Law and Freedom Law Firm hereby stipulates and agrees as follows:

WHEREAS, Plaintiff filed its Complaint on August 18, 2022;

WHEREAS, Defendant NCTUE'S deadline to respond to Plaintiff's Complaint is September 13, 2022;

WHEREAS, due to the recent retention of counsel, NCTUE's counsel needs additional time to investigate and prepare a response to the Complaint;

WHEREAS, Plaintiff has agreed to give Defendant NCTUE up through and including October 13, 2022 in which to respond to Plaintiff's Complaint;

1 WHEREAS, there are no other deadlines that are affected by this stipulation that are  
2 presently known to the parties; and

3 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

4 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up  
5 through October 13, 2022 in which to respond to Plaintiff's Complaint.

6  
7 Respectfully Submitted by:

8 **GREENE INFUSO, LLP**

9  
10 /s/ Michael V. Infuso  
11 Michael V. Infuso, Esq.  
12 Nevada Bar No. 7388  
13 Keith W. Barlow, Esq.  
14 Nevada Bar No. 12689  
15 3030 South Jones Blvd. Suite 101  
16 Las Vegas, Nevada 89146

Approved by:

**KIND LAW**

/s/ Michael Kind  
Michael Kind, Esq.  
Nevada Bar No. 13903  
8860 S. Maryland Pkwy, Suite 106  
Las Vegas, Nevada 89123

**FREEDOM LAW FIRM**

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, esq.  
Nevada Bar No. 15171  
8985 S. Eastern Ave., Suite 350  
Las Vegas, Nevada 89123

**ORDER**

**IT IS SO ORDERED.**

Dated this 25th day of August 2022.

23 Clayton L. Zouchak  
24 U.S. MAGISTRATE JUDGE  
25  
26  
27  
28